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Attorneys for Plaintiff
United States of America

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

MIGUEL CAMARGO, JR.,

Defendant.

CASE NO. 2:23-CR-111-DJC

STIPULATION REGARDING EXCLUDABLE
TIME PERIODS UNDER SPEEDY TRIAL ACT;
FINDINGS AND ORDER

DATE: November 2, 2023

TIME: 9:00 a.m.

COURT: Hon. Daniel J. Calabretta

STIPULATION

Plaintiff United States of America, by and through its counsel of record, and defendant, by and through defendant's counsel of record, hereby stipulate as follows:

1. By previous order, this matter was set for status on November 2, 2023.
2. By this stipulation, defendant now moves to continue the status conference until April 25, 2024, at 9:00 a.m., and to exclude time between November 2, 2023, and April 25, 2024, under Local Code T4.
3. The parties agree and stipulate, and request that the Court find the following:
 - a) The government has represented that the discovery associated with this case includes approximately 4,761 pages of law enforcement reports, search warrant materials, financial records, and other evidence, including audio and video recordings, as well as the

1 voluminous downloaded contents of two seized cell phones. All of this discovery has been either
2 produced directly to counsel and/or made available for inspection and copying.

3 b) Counsel for defendant desires additional time to review this discovery, conduct
4 defense investigation, confer with her client regarding his options for responding to the charges,
5 and otherwise prepare for trial.

6 c) Counsel for defendant believes that failure to grant the above-requested
7 continuance would deny her the reasonable time necessary for effective preparation, taking into
8 account the exercise of due diligence.

9 d) The government does not object to the continuance.

10 e) Based on the above-stated findings, the ends of justice served by continuing the
11 case as requested outweigh the interest of the public and the defendant in a trial within the
12 original date prescribed by the Speedy Trial Act.

13 f) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,
14 et seq., within which trial must commence, the time period of November 2, 2023 to April 25,
15 2024, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code
16 T4] because it results from a continuance granted by the Court at defendant's request on the basis
17 of the Court's finding that the ends of justice served by taking such action outweigh the best
18 interest of the public and the defendant in a speedy trial.

19 4. Nothing in this stipulation and order shall preclude a finding that other provisions of the
20 Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial
21 must commence.

22 IT IS SO STIPULATED.

23
24 Dated: October 27, 2023

PHILLIP A. TALBERT
United States Attorney

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27 /s/ DAVID W. SPENCER
DAVID W. SPENCER
Assistant United States Attorney
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1 Dated: October 27, 2023

/s/ NOA OREN

NOA OREN

Counsel for Defendant

MIGUEL CAMARGO, JR.

6 **ORDER**

7 IT IS SO FOUND AND ORDERED this 27th day of October, 2023.

8 /s/ Daniel J. Calabretta

9 THE HONORABLE DANIEL J. CALABRETTA

10 UNITED STATES DISTRICT JUDGE